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Stryker Corporation and Stryker Sales Corporation*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RYAN Q. CLARIDGE,

Plaintiff,

vs.

I-FLOW CORPORATION, a Delaware corporation; I-FLOW, LLC, a Delaware limited liability company; DJO LLC (f.k.a. DJ ORTHOPEDICS, LLC), a Delaware limited liability company; DJO, INCORPORATED, aka DJO, INC., a Delaware corporation; STRYKER CORPORATION, a Michigan corporation; and STRYKER SALES CORPORATION, a Michigan corporation,

Defendants.

CASE NO.: 2:18-cv-01654-GMN-BNW

**STIPULATED MOTION TO EXTEND
THE JULY 31, 2020 DISCOVERY
DEADLINE TO AUGUST 31, 2020 AND
CORRESPONDING EXTENSION OF
PRE-TRIAL DEADLINES**

Pursuant to the agreement of the Parties and as contemplated at the June 23, 2020 hearing, the Parties file this stipulated motion for an Order extending the discovery closure deadline to August 31, 2020, along with an extension of all corresponding pre-trial deadlines, pursuant to Fed. R. Civ. P. 16(b)(4) and Local Rules 26-3 and IA 6-1.

After meeting & conferring in accordance with the Court's ruling on Defendants' Motion to Compel, the parties have agreed that a discovery extension past the current July 31, 2020 deadline is appropriate to enable the parties to comply with the Court's June 23, 2020 Order on the Motion

1 to Compel, complete remaining fact and expert depositions, allow for Plaintiff's supplementation
 2 of responses to Defendants' discovery, issuance of subpoenas to third parties, obtaining and
 3 reviewing documents from those third parties, and potential further investigation and discovery
 4 stemming from those productions.

5 The Parties have scheduled expert depositions for August 7 and August 13, and another
 6 expert deposition will be conducted before the end of August in Florida or remotely if unable to
 7 proceed safely in person. Multiple fact witness depositions are being scheduled in August.

8 The Parties still also await the Judge Navarro's decision on Plaintiff's objection to the
 9 Court's Order compelling Plaintiff to present for neurological and psychological Rule 35
 10 examinations by separate physicians, a prerequisite to scheduling the examinations, obtaining their
 11 reports, and possible proceeding with their depositions.

12 **IT IS HEREBY STIPULATED AND AGREED THAT:**

13 With the Court's consent, the discovery closure deadline in this action shall be extended to
 14 August 31, 2020. Dispositive motions shall be filed by November 6, 2020, and the Final Pretrial
 15 Order shall be submitted by December 7, 2020

16 **IT IS SO STIPULATED AND AGREED.**

17
 18 ERIN JURY ATTORNEYS

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IT IS SO ORDERED.

DATED: August 3, 2020

UNITED STATES MAGISTRATE JUDGE